

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.¹

PROMESA

Title III

No. 17 BK 3283-LTS
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY (“HTA”),

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

**[PROPOSED] ORDER GRANTING MOTION OF ASSURED GUARANTY CORP.,
ASSURED GUARANTY MUNICIPAL CORP., AND NATIONAL PUBLIC FINANCE
GUARANTEE CORPORATION FOR ADEQUATE PROTECTION OR, IN THE
ALTERNATIVE, FOR RELIEF FROM THE AUTOMATIC STAY**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Upon consideration of the *Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and National Public Finance Guarantee Corporation for Adequate Protection or, in the Alternative, for Relief from the Automatic Stay* (the “Motion”),² and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. The Debtors are ordered to provide adequate protection to the Movants by remitting the Pledged Revenues to the Fiscal Agent in accordance with the Resolutions. [or]
3. [The automatic stays of sections 362 and 922 of the Bankruptcy Code, as incorporated into PROMESA, are hereby lifted to permit Movants to bring one or more actions, other than before the Honorable Laura Taylor Swain sitting by designation pursuant to PROMESA § 308 (48 U.S.C. § 2168), seeking application of the Pledged Revenues to the payment of the Bonds, including by enforcing their liens on the Pledged Revenues and pursuing all related contractual, statutory, constitutional, or other claims, or by pursuing any other relevant claim or remedy at law or in equity.]
4. The automatic stays of sections 362 and 922 of the Bankruptcy Code, as incorporated into PROMESA, are hereby lifted to permit Movants to bring one or more actions under PROMESA § 407 in the United States District Court for the District of Puerto Rico with respect to the Pledged Revenues.

Dated: _____

² Capitalized terms used, but not defined, in this order shall have the meanings ascribed to such terms in the Motion.